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February 18, 2015

BY ECF

Honorable Richard J. Sullivan U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 2104
New York, New York 10007
sullivanNYSDchambers@nysd.uscourts.gov

RE: **United States of America v. Zvi Goffer**, Criminal No. 1:10-cr-56-1

Dear Judge Sullivan:

I represent Defendant Zvi Goffer ("Goffer") in the above-referenced matter. I write to request an additional forty (40) day extension of time, from February 22nd, 2015 to April 3rd, 2015, to file a Memorandum of Law in support of Goffer's Motion to Vacate Sentence and Conviction Pursuant to 28 U.S.C. § 2255. Defendant offers the following in support.

Attorney William Mallory Kent will file a motion for admission pro hac vice and notice of appearance in order to assist in Goffer's defense. Said filings were delayed over the processing of updated certificates of good standing from the state bars of California and Florida. Additionally, Mr. Kent requires additional time to review the voluminous trial transcript.

Finally, neither Mr. Kent nor I have been able to schedule a legal call with Goffer in the past 20-days, despite numerous attempts.

Accordingly, Goffer respectfully requests a brief extension of time. This is the second such request. An extension would not affect any other scheduled date in this matter, and the government **does** consent to this motion. I bring to the Court's attention that the Assistant United States Attorney litigating this matter, Richard Tarlowe, left the US Attorney's Office and the matter was recently assigned to Assistant United States Attorney Jaimie Nawaday.

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Thank you for your consideration.

Respectfully,

A handwritten signature in black ink, appearing to read 'Yale Klat', is positioned below the word 'Respectfully,'.

Yale Klat Esq.